



Lawton Chiles  
Governor

# Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

## NOTICE OF PERMIT ISSUANCE

In the Matter of an Application  
for Permit by:

DEP File No.: 0570040-008-AC  
County: Hillsborough

Mr. Gregory M. Nelson, P.E.  
Manager, Environmental Planning  
Tampa Electric Company  
6944 US Highway 41 North  
Apollo Beach, Florida 33572-9200

# RECEIVED

FEB 22 1999

BUREAU OF  
AIR REGULATION

Enclosed is Permit Number 0570040-008-AC for the construction permit modification to allow for the combustion of a coal/wood-derived fuel (WDF) blend in Unit 3 at the F.J. Gannon Station located on Port Sutton Road in Tampa, issued pursuant to Section 403.087, Florida Statutes.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by filing a Notice of Appeal under Rule 9.110 of the Florida rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida.

Sincerely,

David Zell  
Air Permitting Engineer

copies to:

- DARM, Bureau of Air Regulation, Title V Permit Section, Tallahassee
- Environmental Protection Commission of Hillsborough Co., Air Management Division

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on FEB 16 1999 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120:52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

  
\_\_\_\_\_  
(Clerk)

FEB 16 1999  
(Date)



Lawton Chiles  
Governor

# Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

**PERMITTEE:**

Tampa Electric Company  
702 North Franklin Street  
Tampa, Florida 33602

**Effective Date:** 02/16/1999  
**Permit No:** 0570040-008-AC  
**County:** Hillsborough  
**Expiration Date:** 12/31/1999  
**Project:** F.J. Gannon Station -  
Unit No. 3 WDF Modif.

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-204, 62-210, 62-212, 62-213, 62-296, 62-297, and Chapter 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the Florida Department of Environmental Protection:

For the modification of the F.J. Gannon Station Unit 3 steam generator operating limitations to allow for the firing of a coal and wood-derived fuel (WDF) blend. WDF can be composed of Paper Pellets, Yard Trash, and Wood/Wood Chips, as defined in this permit.

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**Location:** Port Sutton Road, Tampa

**UTM:** 17-360.1 E 3087.5 N

**Facility ID No:** 057004

**Emission Unit ID No:** 003

**Note:** Please reference Permit No. and Emission unit ID No. in all correspondence, test report submittals, applications, etc.

**Modifies Permit No.:** AO29-172179

**Permittee**  
Tampa Electric Company

**Permit No.:** 0570040-008-AC  
**Project:** Gannon Unit 3 WDF Modif.

**Specific Conditions:**

1. A part of this permit is the attached 15 General Conditions. [Rule 62-4.160, F.A.C.]
2. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, or any other requirements under federal, state or local law. [Rule 62-210.300, F.A.C.]

**Note:** The following conditions modify the conditions of operation permit **AO29-172179** where applicable. All other conditions of the above operation permit continue to apply.

Operation Limitations - Fuels

3. This unit is permitted to be fired on coal or a coal / wood-derived fuel (WDF) blend with the following restrictions:

- A. The maximum amount of WDF fired shall not exceed 10% of the fuel fired in the boiler on a weight basis. (*\* Note: See C. below for additional restrictions.*)
- B. WDF shall be defined only as material falling under one of the following type categories (*\* Note: See C. below for additional restrictions*):
  - i. Paper Pellets - Pellets consisting of paper, cardboard and polymer-impregnated or coated paper, such as disposable drinking cups, paper plates, etc., It shall include no materials coated or treated with hazardous substances including, but not limited to, tar, asphalt, and coatings containing heavy metals. Pellets shall be free of hazardous substances and as free as practicable of metal, hard plastics, textiles, and food products.
  - ii. Yard Trash - As defined in Rule 62-701.200 (90), F.A.C., and shall contain only vegetative material resulting from landscaping maintenance or land clearing operations and includes materials such as trees and shrub trimmings, grass clippings, palm fronds, trees and tree stumps.
  - iii. Wood/Wood Chips - Derived from clean wood lumber, pallets, construction debris free of listed hazardous substances including, but not limited to, pentachlorophenol, creosote, tar, asphalt, and paint containing heavy metals.

*(Note: The above definitions are the same as those included in the Department's WDF Test Burn Authorization letter dated 3/18/97.)*

**Specific Conditions:**

3. *(continued)*

C. Based upon the operating conditions during the (March 4 and May 27) 1998 WDF test burn, the following additional WDF usage restrictions apply until additional compliance stack testing is done during firing of different WDF blend ratios and WDF types.

- i. WDF is limited to a maximum of 7.0% of the fuel fired in the unit on a weight basis (*based on tested WDF blend ratio (6.3%) + 10% = 7.0%*).
- ii. WDF is limited to paper pellets only.

In order to increase the WDF blend ratio above the level in C. i. (but never to exceed 10% WDF), or allow for the blending of Yard Trash and Wood/Wood Chips as part of the WDF, then additional testing shall be conducted on Unit 3. To increase the blend % for WDF consisting of paper pellets only, PM and VE testing only will be required. Successful testing showing compliance with the operation permit limitations at a higher blend ratio will allow future operation up to that level + 10% (not to exceed 10% WDF by weight). Successful testing while firing Yard Trash and Wood/Wood Chips will allow for subsequent use of those categories of WDF as part of the coal/WDF blend. The permittee shall notify the Air Compliance Section of the Southwest District Office of the Department and the Air Management Division of the Environmental Protection Commission of Hillsborough County (EPC), at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted. The test notification shall include a proposed test protocol, which upon agreement by the Department will establish the testing to be done and the conditions under which the test will be conducted. A copy of the test report shall be submitted to the Air Management Division of the EPC and the Air Compliance Section of the Southwest District Office of the Department within 45 days after the test is completed.

*Testing Note: As it deems appropriate and applicable, the Department may take into account the results of any WDF blend testing conducted on F.J. Gannon Unit 4 in approving changes to WDF types and blend ratios for Unit 3 in lieu of additional testing on Unit 3.*

**Specific Conditions:**

- D. Paper pellets fired in this unit shall be produced using a waste separation process as described or similar to that described as the "typical waste separation process for Paper Pellets" submitted as Attachment D to the application for this project, including separation of large items, hand sorting, metal extraction/separation, air classification, organic material screening, and large film plastic removal; or equivalent waste separation processing methods (i.e. methods that are designed to result in a target level of approximately 5% or less non-paper materials in the final waste stream). Each time that the permittee receives material from a new paper pellet supplier, or there is a significant change in the waste separation process of a prior supplier, the permittee shall submit a detailed description of the waste separation process used by that supplier (or changes to a previously submitted supplier's process) to the Air Management Division of the Environmental Protection Commission of Hillsborough. The Department reserves the right to request additional information, require additional testing of, or disapprove use of paper pellets from this supplier if it has good reason to believe that this waste separation process will not result in material that meets the above definition of Paper Pellets.

[Rules 62-4.070(3), 62-297.310(7)(a)9, and 62-297.310(8), F.A.C., permit application dated August 1998, and Department test burn authorization letter of March 18, 1997]

Additional Recordkeeping Requirements

4. In order to document compliance with Specific Condition No. 3, the permittee shall maintain daily records for Unit 3 of the quantity (tons) of WDF fired, with a statement as to the type(s) of WDF included (i.e. Paper Pellets, Yard Trash and/or Wood/Wood Chips), and the coal/WDF blend ratio (on a weight basis). The permittee shall also keep records, on a monthly basis of the estimated total of WDF fired by type (i.e. Paper Pellets, Yard Trash and/or Wood/Wood Chips). This monthly record shall also include a statement identifying the suppliers of the paper pellets used that month. These records shall be recorded in a permanent form suitable for inspection by the Department upon request, and shall be retained for at least a five (5) year period.

[Rule 62-4.070(3), F.A.C.]

Additional Compliance Testing Requirements

5. Future annual particulate and visible emissions testing shall be conducted while firing coal/WDF blend at 90-100% of the maximum permitted WDF blend ratio (or the maximum WDF blend ratio for which the permittee wants the unit to be permitted for, not to exceed

**Permittee**  
Tampa Electric Company

**Permit No.:** 0570040-008-AC  
**Project:** Gannon Unit 3 WDF Modif.

**Specific Conditions:**

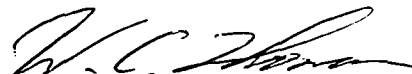
5. *(continued)*

10% WDF). This requirement may be waived (and testing done on 100% coal) if coal/WDF blend has been fired for less than 400 hours in the previous 12 month period and it is anticipated that it will not be used for more than 400 hours in the next 12 month period. The test reports shall include a statement and documentation of the coal/WDF blend ratio (weight basis) in use during the test, including a statement as to the types of WDF (i.e. Paper Pellets, Yard Trash and/or Wood/Wood Chips) included in the WDF material fired. [Rules 62-4.070(3), and 62-297.310(20 and (8), F.A.C.]

Title V Operation Permit Application Revision

6. Within 60 days of final issuance of this construction modification permit, the permittee shall submit a Title V operation application to include the terms of this Unit 3 construction permit in the Title V permit for the F.J. Gannon Station. [Rule 62-213.420, F.A.C.]

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION



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W. C. Thomas, P.E.  
District Air Program Administrator  
Southwest District

ATTACHMENT - GENERAL CONDITIONS

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes (F.S.). The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. Not applicable to Air Permits.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
  - a. Have access to and copy any records that must be kept under conditions of the permit;



GENERAL CONDITIONS:

- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonable necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. A description of and cause of noncompliance; and
- b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to educe, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Section 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rule 62-4.120 and 62-730.300 F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

GENERAL CONDITIONS:

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

1. the date, exact place, and time of sampling or measurements;
2. the person responsible for performing the sampling or measurements;
3. the dates analyses were performed;
4. the person responsible for performing the analyses;
5. the analytical techniques or methods used;
6. the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

16. Not applicable to Air Permits.

17. Not applicable to Air Permits.